



5. Plaintiff Cynthia L. Merlini assents to this motion.

WHEREFORE, Defendant Canada respectfully requests that this Court grant this motion and permit Laura A. Seferian to enter his appearance *pro hac vice* in the above-captioned matter.

Dated: June 12, 2020

Respectfully submitted,

DEFENDANT CANADA,

By its Attorneys,

/s/ Tony K. Lu

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**CERTIFICATION OF LAURA A. SEFERIAN**

Pursuant to this Court's Rule 83.5.3(e)(3), I, Laura Arshalous Seferian, hereby certify as follows:

1. I am not a member of the bar of this Court or of the Massachusetts bar. I am seeking admission *pro hac vice* to this Court to represent Defendant Canada in *Merlini v. Canada*, No. 1:17-cv-10519-NMG. I have previously represented Canada in this proceeding on appeal before the U.S. Court of Appeals for the First Circuit and the U.S. Supreme Court.

2. I am a member in active good standing of the bars of:

- a) the District of Columbia;
- b) Illinois;
- c) Virginia;
- d) the U.S. Court of Appeals for the First Circuit; and
- e) the United States District Court for the Eastern District of Virginia.

3. I am not currently, and have never been, subject to disciplinary proceedings in any jurisdiction in which I have been admitted to practice.

4. I have not previously been admitted to this Court (*pro hac vice* or otherwise), and have never had my admission to any court revoked for misconduct.

5. I have read and agree to comply with this Court's Local Rules.

/s/ Laura A. Seferian  
Laura A. Seferian  
Dentons US LLP  
1900 K Street NW  
Washington DC 20006  
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(202) 496-7339

Dated: June 12, 2020

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)**

I hereby certify that Defendant has conferred with Plaintiff and Plaintiff assents to this motion.

/s/ Tony K. Lu  
Tony K. Lu

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all parties as identified on the NEF on June 12, 2020.

/s/ Tony K. Lu  
Tony K. Lu